

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

Teja Ravi, Individually and on Behalf of	:	
All Others Similarly Situated	:	
	:	
Plaintiff,	:	No. 20-1237C
	:	(Senior Judge Firestone)
	:	
v.	:	
	:	
The United States of America	:	
	:	
Defendant.	:	

PLAINTIFF’S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Pursuant to the Rules of the Court of Federal Claims, Plaintiff Teja Ravi (“Plaintiff”) respectfully moves the Court for leave to file the attached Amended Class Action Complaint. Rule 15 provides that “a party may amend its pleading [with] the court’s leave” and that “[t]he court should freely give leave when justice so requires.” Fed Ct. Fed. Cl. 15(a)(2). Allowing Plaintiff to file the Amended Complaint would serve justice and promote judicial efficiency. Further, there would be no substantial or undue prejudice, bad faith, undue delay, or futility.

Through the Amended Complaint, Plaintiff seeks to add an additional lead Plaintiff—Swetha Bachu—to the Complaint. Ms. Bachu is one of the many who never received educational services after she accepted an offer to pay tuition money in exchange for an accredited educational program. Here, allowing Plaintiff to file the Amended Complaint would serve justice and promote judicial efficiency. There is no undue delay, bad faith, or dilatory motive by Plaintiff. As no discovery has occurred yet, Plaintiff would not be unduly or substantially prejudiced by the filing of the amended complaint.

Further, Plaintiff seeks to add additional language to his complaint stating that the United States government gave authority for the creation of the University of Farmington and to contract with the students by accepting tuition money in exchange for educational services.

Plaintiff remains focused on obtaining equitable monetary relief in this matter, including restitution for consumer victims and the disgorgement of Defendants' ill-gotten gains through breach of contract.

"It is well established that the grant or denial of an opportunity to amend pleadings is within the discretion of the trial court." *Mitsui Foods, Inc. v. United States*, 867 F.2d 1401, 1403 (Fed. Cir. 1989). The court should liberally exercise its discretion to grant leave to amend. *Id.* at 1403-04.

For all of these reasons, Plaintiff respectfully request that the Court grant Plaintiff leave to file the attached Amended Complaint.

Dated: January 12, 2021
Washington, DC

Most respectfully,

By: /s/Amy E. Norris, Esq., (#1017140)
Amy@mwlc.org
(202) 530-0100
NORRIS LAW, PLLC
616 E Street NW
Suite 1156
Washington, DC 20004

Attorney for Teja Ravi

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on this 12th day of January 2022, a copy of the foregoing “MOTION FOR LEAVE TO AMEND COMPLAINT” was filed electronically. I understand that notice of this filing will be sent to all parties by operation of the Court’s electronic filing system.

s/ Amy E. Norris, Esq., (#1017140)